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Case 3:07-cv-04131-MMC

1	1.	1. Plaintiff is filing two Motion for Summary Judgment Opposition Briefs tomorrow			
2	in this same court on the Main Action (Pacific Information Resources v				
3	Musselman, Case No. 06-2306 MMC;				
4	2.	2. Plaintiff is filing two Motions for Summary Judgment next week in the Main			
5		Action (Pacific Information Resources v Musselman, Case No. 06-2306 MMC;			
6	3.	Extrapolating the voluminous data necessary to support the Default Judgement			
7		which will be in excess of \$3 million has taken much, much more time than			
8		anticipated; and			
9	4.	One of Plaintiff's experts, Professor	Ran Ha	adas, is teaching and researching at the	
0		University of Sydney in Australia un	til July	, 2008. Thus, coordinating with	
1		Professor Hadas has been an extreme	ely time	e consuming and logistical challenge.	
2	Plaintiff assures the Court there will be no further requests for a continuance of this				
3	matter.				
4	There will be no prejudice to any party who has direct or related interest in this case,				
5	including those parties who are Defendants in the related case noted herein.				
6	Plaintiff humbly requests this final extension in order to properly comply with all				
7	statutory and local criteria for granting the Default Judgment Application.				
8		Respectfully submitted,			
9	DATED: January 31, 2008		NOVO LAW GROUP, P.C.		
20			BY:	/s/Konrad L. Trope, Esq.	
21			ы.	California State Bar No. 133214 Novo Law Group, P.C.	
22				4631 Teller Avenue, Ste 140 Newport Beach, California 92660	
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24				E-mail: ktrope@novolaw.com Attorneys for Plaintiff PACIFIC	
25				INFORMATION RESOURCES, INC.	
26		_			
27	Request to Continue Date for Filing Motion for Default Judgment				
28	pacific information r	Case No. CV-07-4131 pacific information resources\pleadings\sullivan and simple communications\req to cont date for def judg final as filed 01 31 08			

|PROPOSED| ORDER Plaintiff Pacific Information Resources has hereby requested continuance to file its Defaults Judgment Application against Defendants William Travis Sullivan and Simple Communications to February 15, 2008. Having considered the requested extension, good cause appearing, therefore, and no prejudice any parties appearing, IT IS HEREBY ORDERED that: Plaintiff shall file its Application for Default Judgment not later than February 15. 2008 Further, the Case Management Conference is CONTINUED from February 8, 2008 to May 2, 2008. Dated: February 4, 2008 ed States District Judge

Request to Continue Date for Filing Motion for Default Judgment

Case No. CV-07

pacific information resources\pleadings\sullivan and simple communications\req to cont date for def judg final as filed 013108